



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

August 7, 1997

Katherine A. Ray, Treasurer
Committee for Good Leadership
P.O. Box 11746
Birmingham, AL 35202

Identification Number: C00200642

Reference: Year End (7/1/95-12/31/95), April Quarterly (1/1/96-3/31/96) and
October Quarterly (7/1/96-9/30/96) Reports

Dear Ms. Ray:

This letter is to inform you that as of August 6, 1997, the Commission has not received your response to our requests for additional information dated July 16, 1997. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Debbie Manzano on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson", is positioned above the typed name.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JUL - 2 1997

Katherine R. Ray, Treasurer
Committee For Good Leadership
2000 Southbridge Parkway, Suite 550
Birmingham, AL 35209

JUL 16 1997

Identification Number: C00200642

RECEIVED

Reference: October Quarterly Report (7/1/96-9/30/96)

Dear Ms. Ray:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.

-Your calculations for Line 23, Column B appear to be incorrect. FEC calculations disclose this amount(s) to be \$1,500. Please provide the corrected total(s) on the Detailed Summary Page.

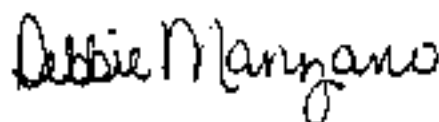
-For future reporting purposes, please note that you should provide the appropriate figures for Lines 20 and 31 of the Detailed Summary Page. Since your committee does not report any shared federal/non-federal activity, all of your receipts and disbursements are considered to be federal. Thus, your total receipts and your total federal receipts (Lines 19 and 20) should be the same, just as your total disbursements and total federal disbursements (Lines 30 and 31) should also be the same.

-Schedule A supporting Line 11(a)(i) discloses contributions received through a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)) For your information, instead of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution exceeds \$200 in the aggregate during the calendar year; and a statement of the amount deducted per pay period. 11 CFR §104.8(b)

-The name of your connected organization, First Commercial Bank, must be included in the name of your political committee. While committees may use commonly recognized abbreviations on daily communications such as letterhead and committee checks, committee filings (Statement of Organization, disclosure reports and amendments) must reflect the official name of the connected organization, as well as any abbreviation, within its title. 2 U.S.C. §432(e)(5)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Debbie Manzano
Senior Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

| SCHEDULE A | | ITEMIZED RECEIPTS | | Use separate schedules for each category of the Deductible Summary Page | PAGE | OF |
|--|--|-----------------------------|--|---|------------------------------------|-----------------|
| Contributions from Individuals | | | | FOR LINE NUMBER | 11(a)(ii) | |
| Any information copied from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for any other purpose. When then using the name and address of any political committee to solicit contributions from such contributors. | | | | | | |
| NAME OF COMMITTEE (in Full) National Organization PAC 000000001 | | | | | | |
| A. Full Name, Mailing Address and ZIP Code | | Name of Employer | | Date - month - day, year | Amount of Each Receipt This Period | |
| Anne Sullivan 21 18th Street City, State ZIP | | National Organization, Inc. | | payroll deduction | \$90.00 | |
| Branch For: _____ Primary _____ General _____ Other (specify): _____ | | Occupation: Branch Manager | | Aggregate Year-to-Date > \$ | 288.00 | (\$18 biweekly) |
| B. Full Name, Mailing Address and ZIP Code | | Name of Employer | | Date - month - day, year | Amount of Each Receipt This Period | |
| Rodney Jones 881 Hainsbury Road City, State ZIP | | National Organization, Inc. | | payroll deduction | \$180.00 | |
| Branch For: _____ Primary _____ General _____ Other (specify): _____ | | Occupation: Vice President | | Aggregate Year-to-Date > \$ | 360.00 | (\$20 biweekly) |

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

IN-KIND CONTRIBUTIONS

| SCHEDULE A | | ITEMIZED RECEIPTS | | Use separate schedules for each category of the Deductible Summary Page | PAGE | OF |
|--|--|-----------------------------|--|---|------------------------------------|----------------|
| Contributions from Individuals | | | | FOR LINE NUMBER | 11(a)(ii) | |
| Any information copied from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for any other purpose. When then using the name and address of any political committee to solicit contributions from such contributors. | | | | | | |
| NAME OF COMMITTEE (in Full) National Organization PAC 000000001 | | | | | | |
| A. Full Name, Mailing Address and ZIP Code | | Name of Employer | | Date - month - day, year | Amount of Each Receipt This Period | |
| Martin L. Kress 4 River Road City, State ZIP | | National Organization, Inc. | | 6/19/94 | \$3,999.00 | (IN-KIND) |
| Branch For: _____ Primary _____ General _____ Other (specify): _____ | | Occupation: Chairperson | | Aggregate Year-to-Date > \$ | 3,999.00 | (RAFFLE PRIZE) |

| SCHEDULE B | | ITEMIZED DISBURSEMENTS | | Use separate schedules for each category of the Deductible Summary Page | PAGE | OF |
|--|--|-------------------------|--|---|---|------------------------|
| Operating Expenditures/Other Federal | | | | FOR LINE NUMBER | 21(b) | |
| Any information copied from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for any other purpose. When then using the name and address of any political committee to solicit contributions from such contributors. | | | | | | |
| NAME OF COMMITTEE (in Full) National Organization PAC 000000001 | | | | | | |
| A. Full Name, Mailing Address and ZIP Code | | Purpose of Disbursement | | Date - month - day, year | Amount of Each Disbursement This Period | |
| Martin L. Kress 4 River Road City, State ZIP | | raffle prize | | 6/19/94 | \$3,999.00 | (IN-KIND CONTRIBUTION) |
| Disbursement for: _____ Primary _____ General _____ Other (specify): _____ | | | | | | |

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.B(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

